

## **REMARKS**

This Amendment is submitted in response to the non-final Office Action mailed on September 20, 2007. Claims 1-3, 5, and 6 are pending. In view of the following remarks, as well as the preceding amendments, Applicants respectfully submit that this application is in complete condition for allowance and request reconsideration of the application in this regard.

### **Rejections under 35 USC § 102**

Claims 1-3, 5, and 6 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,892,496 to Youngs et al. (hereinafter *Youngs*). Claim 1 is the sole remaining independent claim subject to this rejection. The Examiner contends that *Youngs* shows or teaches all the features of the rejected claims. Applicants respectfully traverse the Examiner's contention.

In contrast to Applicants' independent claim 1, as amended, *Youngs* fails to disclose "a plurality of fasteners securing said door component to said carrier plate" and "said fasteners further securing said door component and said carrier plate to said door frame" with the additional recitation that the fasteners are "configured to initially support the door component on said carrier plate before said carrier plate is positioned between said door frame and said door trim panel in the assembly."

*Youngs* discloses push-fit fasteners (42) that secure the window regulator assembly (30) and the lock-latch assembly (32) with the carrier plate (16). See column 3, lines 53-55. As apparent in Fig. 1 of *Youngs*, the push-fit fasteners (42) are received in blind openings in the window regulator assembly (30) and the lock-latch assembly (32), which do not penetrate through the window regulator assembly (30) and the lock-latch assembly (32). Consequently, although the push-fit fasteners (42) arguably support the window regulator assembly (30) and the lock-latch assembly (32) on the carrier plate (16) before assembly, *Youngs* fails to disclose that the push-fit fasteners (42) secure the window regulator assembly (30) and the lock-latch assembly (32) with the door frame (12) in the assembly.

*Youngs* also discloses fasteners (58) that secure the carrier plate (16) with the door frame (12) in the assembly. See column 4, lines 35-39. However, the fasteners (58) do not support the window regulator assembly (30) and the lock-latch assembly (32) to the carrier plate (16) either before or after assembly.

*Youngs* also discloses fasteners (64) that are used to secure the window regulator assembly (30) and the lock-latch assembly (32) with the door frame (12). *See* column 4, lines 43-46. However, the fasteners (64) do not secure the carrier plate (16) to the door frame (12), as set forth in claim 1. As explained at column 4, lines 43-67 of *Youngs*, the fasteners (64) for the window regulator assembly (30) fit in a notch (16A) in the carrier plate (16). The notch (16A) is intentionally present in the carrier plate (16) to “provide access to upper apertures 66 of the window regulator assembly 30.” Hence, fasteners (64) inserted into the upper apertures (66) of the window regulator assembly (30) do not secure the carrier plate (16) to the door frame (12). Apertures (68) in the carrier plate (16) are “larger than the third fasteners 64” used to attach the lower portion of the window regulator assembly (30) to the door frame (12). *Youngs* states that these fasteners (64) “do not attach the window regulator assembly 30 to the door body 12.” Moreover, the lock-latch assembly (32) is attached to a side portion (13) of the door frame (12) using fasteners (64), which is outside of the footprint of the carrier plate (16). Hence, the fasteners (64) used to secure the lock-latch assembly (32) to a side portion (13) of the door frame (12) do not secure the carrier plate (16) to the door frame (12).

As mentioned in remarks hereinabove, the fasteners (58) secure the carrier plate (16) with the door frame (12). Consequently, because a separate set of fasteners (58) serves this function, it is not inherent in the disclosure of *Youngs* that the fasteners (64) would be configured to secure the carrier plate (16) to the door frame (12).

In addition, the fasteners (64) do not support the window regulator assembly (30) and the lock-latch assembly (32) on the carrier plate (16) before assembly. On page 3 of the Office Action, the Examiner states in reference to fasteners (64) that “the fasteners are adapted to support the door component 30 on the carrier plate 12 since the fasteners can extend through the openings in the carrier plate 12 and door component 30 as shown in figure 3.” As explained in *Youngs*, the fasteners (64) are used to secure the window regulator assembly (30) and the lock-latch assembly (32) to the door body (12) only “[a]fter the carrier 16 has been attached to the door body 12.” *See* column 4, lines 43-46.

As mentioned in remarks hereinabove, the push-fit fasteners (42) arguably support the window regulator assembly (30) and the lock-latch assembly (32) on the carrier plate (16) before assembly. Consequently, because a separate set of fasteners (42) serves this function, it is not inherent in the disclosure of *Youngs* that the fasteners (64) would be configured to support the

window regulator assembly (30) and the lock-latch assembly (32) on the carrier plate (16) before assembly.

Hence, no single plurality of fasteners (42, 58, 64) disclosed in *Youngs* satisfies all of the structural requirements set forth in Applicants' claim 1.

In order for a reference to anticipate a claimed invention, the reference must teach each and every element in the precise arrangement set forth in the claim. *See* MPEP § 2131. If the reference fails to teach even one of the claimed features, the reference does not and cannot anticipate the claimed invention. Because of the deficiencies of *Youngs* identified hereinabove, *Youngs* fails to anticipate claim 1. For at least that reason, Applicants respectfully request that the Examiner withdraw this rejection.

Because claims 2, 3, 5, and 6 depend from independent claim 1, Applicants submit that these claims are also patentable. Furthermore, claims 2, 3, 5, and 6 each recite a unique combination of elements not disclosed or suggested by *Youngs*.

### **Conclusion**

Applicants have made a bona fide effort to respond to each and every requirement set forth in the Office Action. In view of the foregoing remarks and amendments, this application is submitted to be in complete condition for allowance. Accordingly, a timely notice of allowance to this effect is earnestly solicited. If there is any additional matter that may be resolved by telephone or fax, the Examiner is invited to contact the undersigned to expedite issuance of this application.

Applicants do not believe that any fees are due in connection with this submission. However, if such petition is due or any fees are necessary, the Commissioner may consider this to be a request for such and charge any necessary fees to Deposit Account No. 23-3000.

Respectfully submitted,  
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